

AZUL S.A.
Public Company
CNPJ/ME nº 09.305.994/0001-29
NIRE 35.300.361.130

AZUL S.A. SUSTAINABILITY POLICY

1. Objective:

This Sustainability Policy ("Policy") aims to establish guidelines for enhancing the sustainability strategy and socio-environmental risk management practices of Azul S.A. along with its subsidiaries ("Azul" or the "Company"), formalizing the commitment to its implementation, in line with the Code of Ethics and Conduct provision, mission, values and applicable laws.

2. Responsibility and Applicability:

This Policy applies to all companies and business units of the Azul group (including Azul S.A., Azul Linhas Aéreas Brasileiras S.A., ATS Viagens e Turismo Ltda., Azul Conecta Ltda., TudoAzul S.A., Azul Viagens, Azul Cargo Express and other affiliates , collectively referred to as "Azul" or "Company"), as well as to all its members (including the president, vice presidents, directors, managers, aeronauts, airline workers and other employees, interns and underage apprentices, as well as members of the Board of Directors, collectively referred to as "Crewmembers").

2.1 Responsibility

2.1.1 Board of Directors

- Define the overall strategies regarding Azul's socio-environmental responsibility;
- Approve Azul's ESG (Environmental, Social, and Governance) strategy and policies;
- Approve the company's materiality matrix;
- Monitor sustainability and ESG-related action plans and indicators;
- Monitor the Company's climate change strategy and decarbonization effort;
- Monitor and evaluate risks and opportunities of climate change for Azul;
- Monitor the strategy for promoting biodiversity conservation and fostering the bioeconomy;
- Assess the effectiveness and efficiency of sustainability plans.

2.1.2 Chief Executive Officer (CEO)

- Establish priorities based on our materiality matrix, which will guide Azul's sustainability projects and program;
- Ensure resources are allocated for the execution of the Company's sustainability projects and program;
- Ensure that the Company's long-term strategies consider the social and environmental impacts of the business;
- Set goals to ensure the Company's continuous improvement process in its sustainability program and projects;

- Track progress of the Company's climate change strategy and decarbonization efforts, and monitor their performance indicators;
- Track progress of the Company's biodiversity and bioeconomy strategy, and monitor their performance indicators.

2.1.3 Vice President of Human Resources, Customers and ESG

- Conduct evaluations of the effectiveness and efficiency of sustainability strategy and actions;
- Monitor projects related to the Company's climate change and decarbonization strategy, reporting on these matters regularly to the ESG Committee and Board of Directors;
- Monitor ESG performance and GHG emissions reduction indicators linked to variable compensation, when applicable;
- Develop activities and projects aligned with Azul's sustainability objectives;
- Consider the most efficient means to reduce socio-environmental impact throughout the operation in decision-making;
- Continuously seek to mitigate socio-environmental impacts;
- Ensure that all leaders in the Company are aligned with Azul's ESG strategy;
- Monitor the progress of the Company's climate change and decarbonization strategy, and monitor their performance indicators;
- Monitor the progress of the Company's biodiversity and bioeconomy strategy, and monitor their performance indicators.

2.1.4 Sustainability Management

- Develop socio-environmental projects for Azul;
- Update the Company's materiality assessment every four years;
- Consider the most efficient means to reduce socio-environmental impact throughout the supply chain in decision-making;
- Continuously seek to mitigate socio-environmental impacts;
- Ensure that all leaders in the Company are aligned with Azul's ESG strategy;
- Develop and monitor projects related to the Company's climate change and decarbonization strategy;
- Develop and monitor projects related to waste segregation, proper waste disposal, and treatment;
- Promote circular economy and upcycling programs;
- Promote projects for biodiversity conservation, combatting deforestation, fostering the bioeconomy and local populations;
- Develop socio-environmental and climate risk indicators and analysis frameworks to monitor the Corporate Risk Matrix;
- Ensure that all sustainability and ESG reporting is done with excellence.

2.1.5 Compliance Management

- Monitor and oversee, as necessary, socio-environmental projects and programs to ensure alignment with the Compliance Policy;
- Collaborate with the sustainability team to monitor corporate risks, particularly socio-environmental and climate-related risks;
- Integrate materiality indicators with Azul's corporate risk assessment and monitoring process.

2.1.6 Investor Relations Department

- Monitor ESG projects to report to investors.

2.1.7 Corporate Purchasing Board

- Approve suppliers based on socio-environmental criteria;
- Ensure the implementation of sustainable procurement projects.

2.1.8 Legal Department

- Assist the procurement team in supplier approval based on socio-environmental criteria;
- Assist the sustainability team with contracts and partnerships in decarbonization projects, environmental conservation and biodiversity promotion, and bioeconomy initiatives.

2.1.9 Operations and Fuel Management

- Analyze and develop decarbonization projects;
- Support the development of audits and projects related to CORSIA, EUETS, and national regulations.

2.1.10 ESG Forum

- Analyze and monitor the Company's ESG projects, ensuring alignment with Azul's strategic planning and accelerating the dissemination of results.

2.1.11 ESG Committee

- Advise the Board of Directors on socio-environmental issues, acting as a liaison;
- Monitor and track the Company's socio-environmental performance.

2.1.12 Management and other leadership positions

- Ensure that the projects and programs developed are aligned with the Company's ESG strategy.

2.1.13 All Crewmembers

- Ensure that sustainability principles are always present in their activities and processes.

3. Definitions:

Accountability: Take responsibility and be accountable for the decisions and activities in favor of Azul's stakeholders.

ESG Committee: Advisory body linked to the Board of Directors, composed of four members appointed by the Board with the responsibility of monitoring and deliberating on projects related to social, environmental, and governance issues. Executive directors, managers, and Company coordinators also participate in the meetings.

Communities: Communities are social groups with whom the Company interacts and/or coexists due to its business portfolio or the projects it develops.

CORSIA (Carbon Offsetting and Reduction Scheme for International Aviation): The International Civil Aviation Organization program, which aims to reduce and offset carbon emissions from international flights.

Sustainable development: Promote development, aiming to meet the needs of the present generation without compromising the ability to meet the demands of future ones.

Disclosure Insight Action (CDP): International nonprofit organization aiming to acquire, analyze, assess, and disclose information regarding companies' climate policies and strategies.

Due Diligence: Refers to a risk assessment - of a prospective supplier, partner, or client - prior to signing a contract or formalizing any business relationship, in order to verify if the candidate presents any form of non-compliance that could impact service delivery and/or the business relationship or image of Azul.

DJSI (Dow Jones Sustainability Index): Global indicator for the stock market that tracks long-term performance based on economic, environmental, and social criteria, recognizing corporate sustainability through different classes.

Ethics: Set of principles, values, and moral and conduct norms of an individual, social group, or society.

EU – ETS (European Union Emissions Trading System or Community-based Emission Allowance Trading Scheme in the European Union): Regulatory instrument for international trade of greenhouse gas emissions within the European Union.

Corporate Governance: System by which organizations are managed, monitored, and incentivized, involving practices and relationships among shareholders, investors, board of directors, management, and oversight bodies. Good corporate governance practices convert the principles of Transparency, Equity, Accountability, and Corporate Responsibility into objective recommendations, with the purpose of preserving and optimizing the organization's value.

ISE (Sustainability Enterprise Index): B3 (Brazilian stock exchange) indicator that reflects the average performance of quoted assets from companies selected for their recognized commitment to corporate sustainability.

Materiality Matrix: Tool for assessing and prioritizing topics for internal and external stakeholders, enabling a comprehensive understanding of impacts, risks, and opportunities to enhance shared value creation.

The matrix is reviewed every four years to gather updates in internal and external contexts. Our results undergoes third-party verification based on the principle of dual materiality.

Sustainable Development Goals (SDGs): Global actions that are part of the "2030 Agenda" in order to address issues such as poverty eradication, food security, health, education, gender equality, reduction of inequalities, energy, water, climate change, sustainable cities, among other topics.

Relationship Public, Interest Public, or Stakeholder: Stakeholders are individuals, companies, or institutions that act as interested parties or essential agents for the Company's activities. They can influence or be influenced by business decisions and objectives.

Socio-environmental Responsibility: Conducting business and activities committed to sustainable development, participating in and promoting ethical and transparent dialogue with stakeholders, considering their expectations, needs, and social, cultural, economic, political, and environmental contexts.

Climate risk: Risks of potential financial loss, margin reduction, or increased costs due to the occurrence of extreme weather events that can modify operations, cause harm to human life, and/or result in asset losses.

4. Guidelines

Azul's vision is to be the best airline in the world. We believe that in order to achieve this, we also need to be the best for the world by bringing benefits and positive impacts to our shareholders, customers, Crewmembers, suppliers, the communities where we operate, and the environment.

Therefore, Azul has established this policy to guide all leaders and employees to ensure that solid sustainability principles are considered in the long-term business strategy.

Aligned with our vision, nation, values, code of ethics and conduct, Azul's sustainability strategy is defined as a connection that transforms, with the aim of fostering lasting and beneficial connections for everyone associated with Azul and solidifying our commitment to sustainable growth, involving and integrating all stakeholders who interact with us.

The main pillars of Azul's ESG Plan are guided by best practices recommended by the United Nations Sustainable Development Goals (SDGs), the Global Compact, the OECD, ISO 26000, the B3 Sustainability Index (ISE), the Dow Jones Sustainability Index (DJSI), Science Based Targets (SBTi), and the Carbon Disclosure Project (CDP).

Thus, our financially resilient and sustainable business model is based on three pillars:

Eco-Efficient Operation: Safety is our top priority. We strive for operational excellence, always ensuring the utmost integrity of our aircraft and Crewmembers.

Focus on People: Engaged and healthy Crewmembers, loyal customers and suppliers, and involved communities, fostering an equitable society and a fair economy.

Going Further: We aim to go the extra mile, developing the society in which we operate and protecting the planet through innovative projects

4.1 General Guidelines

- Ensure that Azul's Strategic Planning considers the short and long-term economic, social, environmental, and legal effects of the Company's operations on Crewmembers, suppliers, customers, and other business partners, as well as the local and global community in which it operates;
- Incorporate issues related to social and environmental responsibility into the management of the business and throughout Azul's decision-making processes, including ESG and emission reduction performance indicators linked to variable compensation;
- Strive for continuous improvement based on best market practices;
- Promote compliance with good corporate governance practices, legislation, along with other applicable instruments and requirements in the territories where Azul operates;
- Respect and uphold fundamental human rights to ensure safety, equality, equal opportunities, freedom of expression, worship, and religion for all individuals working with Azul;
- Implement ongoing mechanisms to identify, prevent, monitor, supervise, and mitigate current or potential social and environmental risks, limitations, and/or impacts, particularly those related to human rights resulting from Azul's activities or its relationships with others;
- Act strongly against human trafficking, sexual exploitation of women and children, and trafficking of wildlife;
- Act and report strongly against cases of slavery-like labor to the authorities;

- Establish ethical and transparent criteria and channels to ensure continuous dialogue with stakeholders, particularly the communities in which Azul is present, regarding the Company's social actions and related investments;
- Proactively identify and mitigate the financial and socio-environmental risks of our operations and potential impacts of our business, contributing to turning all our actions into what drives our sustainable development;
- Reinforced oversight by managing decision implementations, ensuring that they are socially responsible;
- Account for society as a whole regarding Azul's activities and outcomes of its decisions, whether positive or negative.

4.2. Governance Guidelines

- Incorporate issues related to social and environmental responsibility into the business management throughout Azul's decision-making processes;
- Promote respect for human rights by acting preventively and address negative externalities resulting from our activities or from third parties associated with the Company;
- Being attentive to opportunities for generating positive externalities in the communities where Azul operates;
- Collaborate with investments and/or the development of socio-environmental programs and projects aligned with the business objectives and contributing to our society's development;
- Fight climate change by adopting best market practices and monitoring indicators related to the decarbonization strategy of our operations;
- Clearly, objectively, and transparently communicate information about our operations and sustainability-related actions;
- Engage Crewmembers in practicing social responsibility;
- Consider the principles, practices, core themes, and social responsibility issues (accountability, transparency, ethical behavior, respect for stakeholders' interests, respect for the rule of law, compliance with international behavioral norms, and human rights) in the governance system;
- Integrate materiality indicators with Azul's corporate risk assessment and monitoring process;
- Implement systems, objectives, and goals that reflect the commitment to socio-environmental responsibility;
- Take into account the immediate needs and those of future generations, balancing the organization's needs with those of its stakeholders;
- Identify corruption risks while implementing and promoting policies as well as practices to fight corruption and extortion;
- Monitor decision implementations to ensure they are followed in a socially and environmentally responsible manner, accounting for the results of the organization's decisions and activities, whether positive or negative.

4.3 Socio-environmental Management Guidelines

- Strive for excellence in socio-environmental performance by disseminating a culture of sustainability and aim to generate positive socio-environmental externalities well beyond compliance with laws;
- Identify the socio-environmental aspects and impacts of our decisions and activities in our surroundings as well as establish procedures for mitigating identified impacts;
- Implement measures to reduce resource usage while prioritizing the reduction of energy, water, and other environmental resource consumption;
- Identify, monitor, create action plans to reduce, and mitigate pollution related to our operations, such as atmospheric emissions (NOx), greenhouse gas emissions (GHG), waste generation, and noise generation;
- Make the best efforts to achieve NetZero by 2045, following international protocols such as Science Based Targets (SBTi), CORSIA, and EU-ETS;
- Ensure our commitment to no deforestation in all our facilities, operational activities, supply chain, and other value chain partners;
- Ensure efficient consumption relationships in our facilities through the exchange of more efficient equipment and proper disposal of used equipment;
- Prioritize environmental performance criteria for construction processes, renovations, and adaptations of our facilities, ensuring the use of mechanisms for natural lighting and rainwater harvesting;
- Encourage the use of electricity from renewable sources and biofuels;
- Manage solid waste in all our operations, with special attention to hazardous waste;
- Implement selective waste collection programs, fostering the local development of small cooperatives of waste pickers;
- Drive circular economy projects and upcycling of uniforms;
- Regularly hold meetings of the ESG Forum and Committee to monitor goal attainment;
- Develop internal and external awareness campaigns on sustainability;

4.4. Relationship with Crewmembers (strengthening organizational culture)

- Work towards strengthening our honesty and transparency principles;
- Utilize best practices to promote a healthy, safe, diverse, and inclusive work environment for all our Crewmembers, ensuring equal opportunities and gender equality, free from any form of harassment, discrimination, intimidation, or violence;
- Ensure all rights and promote respect for the LGBTQIAPN+ community;
- Disseminate a culture of sustainability, emphasizing the importance of Azul generating positive social and environmental externalities;
- Encourage ethical and sustainable behavior among employees and third parties through actions, and training that contribute to greater socio-environmental efficiency in business management;
- Ensure equal pay opportunities between genders;

- Make efforts to ensure that 50% of women are in senior leadership positions by 2030;
- Ensure the company's performance regarding ESG and GHG emission reduction targets, offering variable compensation linked to these indicators when applicable;
- Encourage active participation of Crewmembers at all levels in social responsibility activities within the organization;
- Foster and recognize the exercise of citizenship by Crewmembers through social actions developed through corporate volunteer programs, empowering them to be agents of change, including in communities directly and indirectly impacted by Azul's activities;
- Adopt measures that contribute to the health and well-being of Crewmembers, such as promoting exercise and the consumption of healthy food;
- Develop, implement, and maintain a health and safety policy based on the principle that solid health and safety standards and organizational performance support and reinforce each other;
- Conduct periodic awareness campaigns on various health-related topics, such as breast cancer, prostate cancer, and obesity prevention;
- Continuously seek additional benefits relevant to the well-being of our Crewmembers;
- Develop internal and external sustainability awareness campaigns;

4.5. Supplier Relationship

- Monitor and evaluate the requirements for supplier contracting while promoting a culture of sustainability through training, internal rules, and continuous monitoring;
- Reduce the environmental impacts of the logistics chain;
- Conduct due diligence to identify, prevent, and address actual or potential impacts on human rights;
- Apply an ESG questionnaire to critical suppliers while promoting the collection and analysis of evidence demonstrating compliance with national labor laws, ensuring decent working conditions regarding wages, working hours, rest periods, vacations, benefits in payment, and an environment where individuals are respected regardless of race, gender, sexual orientation, promoting commitment to diversity and inclusion;
- Guarantee compliance with environmental legislation through the collection and analysis of documents, ensuring that our partners comply with applicable environmental regulations in their business and services provided to Azul. This step is essential to promote good eco-efficiency practice and socio-environmental responsibility in the supplier chain;

4.6 Community Relationship

- Define indicators to monitor social actions and their effectiveness, promote significant social benefits in the communities where they operate, contribute to reducing inequalities while maintaining an environment conducive to the sustainable businesses operation;

- Ensure that requests, calls, and complaints from communities are responded to and addressed appropriately and transparently;
- Encourage corporate volunteering projects in which Crewmembers can engage in social actions that benefit people in situations of social vulnerability, improving neighborhoods and cities in which they live;
- Create new bases as a form of investment whilst fighting poverty through job creation;
- Promote the acknowledgement of neglected people, protect the vulnerable, serve those who suffer, enabling them to develop their capabilities and achieve their aspirations;
- Ensure the expansion of the Organ Transportation Program for transplants.
- Participate in councils, committees (or similar bodies) to discuss local development of the communities in which we are located;
- Make social investments that contribute to the strengthening and sustainable development of communities;
- Value the role of local agents while strengthening civil society.

4.7. Relationship with our Investors

- Engage in transparent corporate governance and adhere to the most relevant market references;
- Create a sustainability report annually, following the guidelines of the Global Reporting Initiative (GRI) Standards - Essential option; Integrated Reporting (IR or IIRC); Sustainability Accounting Standards Board (SASB) Aviation sector indicators; and United Nations Sustainable Development Goals (SDGs).

5. General Provisions:

Azul's complete policy implementation and sustainability strategy :

- I. Implementation of systems, routines, and procedures that enable the identification, classification, assessment, monitoring, mitigation, and control of socio-environmental risks, present in the institution's activities and operations;
- II. Maintaining a data record regarding effective losses due to socio-environmental damages, including location, values, and economic sector, subject to the operation for a minimum period of five years;
- III. Conducting prior assessment of the negative socio-environmental impacts of new types of products and services in new offices, hangars, and operational buildings;
- IV. Development and establishment of procedures to align socio-environmental risks with legal, regulatory, and market changes;
- V. Subordinating actions related to socio-environmental risk management to the organization's risk management unit;
- VI. Establishment of specific criteria and mechanisms for risk assessment when conducting operations related to economic activities with a higher potential to cause socio-environmental damages;

6. Additional References:

The legislation, regulations and other instruments listed below, notably, as eventually amended, revoked or updated, integrate and complement the provisions of this Policy, where applicable:

- Agenda 2030 - Sustainable Development Goals (SDGs) of the United Nations Development Programme (UNDP);
- Code of Ethics and Conduct;
- Decree No. 9.571/2018 - Decree on National Guidelines for Business and Human Rights
- Disclosure Insight Action (CDP);
- Bylaws;
- Law No. 12.305/2010 - National Solid Waste Policy;
- Law No. 13.709/2018 - General Data Protection Law;
- Law No. 6.938/1981 - National Environmental Policy Law;
- International Organization for Standardization - ISO 26.000;
- Third-Party Hiring Policy;
- United Nations Guiding Principles on Business and Human Rights;
- CMN Resolution No. 4327, April 25, 2014;
- Conama Resolution 422/2010.

7. Approval:

7.1 Approval and Validity

This Policy shall be effective as of the date of its approval by the Board of Directors and may be revised as necessary.

7.2 Consequences and Violations Policy

Any violation of this Policy may result in penalties, ranging from verbal warnings to just cause termination. In the event of damages, the responsible party will be required to provide compensation for any harm caused. The consequences imposed by Azul, whether through internal measures or through appropriate legal action, will be applied after evaluating the severity of the specific case and the impacts resulting from the violation.

The Compliance department is responsible for investigating reported cases and submitting them to the Integrity Committee. Incidents related to this matter should be reported to the Ethics and Conduct Committee, which, in serious cases, will ratify its decision with the Board of Directors.

Barueri/SP, 24 de April de 2023.